

EXHIBIT 3

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

CITY OF DETROIT,
a Municipal corporation,

Plaintiff/Counter-Defendant,

Case No: 14-001974-ck

v.

Hon. John A. Murphy

CITY OF HIGHLAND PARK,
a Municipal corporation,

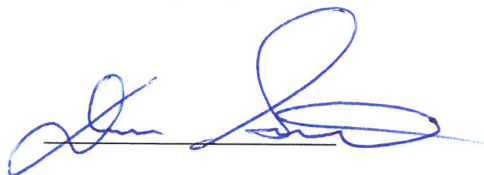
Defendant/Counter-Plaintiff.

**AFFIDAVIT OF DAMON GARRETT IN SUPPORT OF DEFENDANT, CITY OF
HIGHLAND PARK'S, MOTION FOR SUMMARY JUDGMENT ON ITS COUNTER
COMPLAINT FOR A DECLARATORY JUDGMENT**

I, Damon Garrett, P.E., hereby declare under penalty of perjury that the attached is a true and correct compilation of records of the City of Highland Park, to the best of my information and belief.

Dated: 5/5/2017

DAMON GARRETT



**CITY OF HIGHLAND PARK**

Return to Excellence

Office of the Water Department
 Acting Director – Damon L. Garrett, PE
Metro Consulting Associates, LLC

RE: COMPARISON OF ACTUAL SEWER CHARGES BY GLWA/DWSD TO SEWER CHARGES AGREED TO BE CHARGED IN 1996 CONSENT DECREE (JUDGE JOHN FEIKENS)

YEAR	POPULATION*	APPROXIMATE MEDIAN INCOME**	DWSD/GLWA BILLED VOLUME (KCF)***	DWSD/ GLWA BILLED REVENUE***	CHARGES AS % OF MEDIAN INCOME
2016	10,067	\$76,998,674.00	-	\$5,617,200	7.3%
2015	10,335	\$80,113,370.00	-	\$5,569,200	6.9%
2014	10,615	\$82,004,539.00	109,927	\$6,887,428	8.4%
2013	10,908	\$86,059,854.00	105,589	\$5,007,724	5.8%
2012	11,214	\$91,483,086.00	103,754	\$4,840,249	5.3%
2011	11,531	\$91,272,096.00	151,405	\$4,497,397	4.9%
2010	11,776	\$101,873,610.00	133,898	\$3,965,206	3.9%
2009	12,204	\$100,146,624.00	158,565	\$4,438,562	4.4%
2008	12,558	\$106,887,690.00	200,762	\$4,363,745	4.1%
2007	12,925	\$110,011,418.48	177,542	\$3,666,450	3.3%
2006	13,305	\$113,245,796.74	167,026	\$3,370,616	3.0%
TOTALS		\$882,984,714.22	1,308,468	\$41,037,377	4.6%

*Source: SEMCOG & US Census Bureau

**Source: US Census Bureau

***Source: EMMA publicly disclosed financial information. Does not include wet weather flow.

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**CITY OF HIGHLAND PARK**

Return to Excellence

Office of the Water Department

Acting Director – Damon L. Garrett, PE

Metro Consulting Associates, LLC

YEAR	POPULATION*	APPROXIMATE MEDIAN INCOME**	WATER USAGE BASED ON POPULATION (KCF) ***	SEWER CHARGES (WATER USAGE X \$22.66)	WATER CHARGES (WATER USAGE X \$12.05)	TOTAL WATER & SEWER CHARGES BASED ON USAGE	CONSENT DECREE AGREED PAYMENT OF 65% FOR SEWER SERVICES AFTER AUG. 1, 1996	CHARGES AS % OF MEDIAN INCOME
2016	10,067	\$76,998,674.00	98,555.93	\$2,233,277.37	\$1,187,598.96	\$3,420,876	\$2,223,569.61	2.9%
2015	10,335	\$80,113,370.00	101,179.65	\$2,292,730.87	\$1,219,214.78	\$3,511,945	\$2,709,489.85	3.4%
2014	10,615	\$82,004,539.00	103,920.85	\$2,354,846.46	\$1,252,246.24	\$3,607,093	\$2,344,610.26	2.9%
2013	10,908	\$86,059,854.00	106,789.32	\$2,419,845.99	\$1,286,811.31	\$3,706,657	\$2,409,327.24	2.8%
2012	11,214	\$91,483,086.00	109,785.06	\$2,487,729.46	\$1,322,909.97	\$3,810,639	\$2,476,915.63	2.7%
2011	11,531	\$91,272,096.00	112,888.49	\$2,558,053.18	\$1,360,306.30	\$3,918,359	\$2,546,933.67	2.8%
2010	11,776	\$101,873,610.00	115,287.04	\$2,612,404.33	\$1,389,208.83	\$4,001,613	\$2,601,048.55	2.6%
2009	12,204	\$100,146,624.00	119,477.16	\$2,707,352.45	\$1,439,699.78	\$4,147,052	\$2,695,583.95	2.7%
2008	12,558	\$106,887,690.00	122,942.82	\$2,785,884.30	\$1,481,460.98	\$4,267,345	\$2,773,774.43	2.6%
2007	12,925	\$110,011,418.48	126,535.75	\$2,867,300.10	\$1,524,755.79	\$4,392,056	\$2,854,836.32	2.6%
2006	13,305	\$113,245,796.74	130,255.95	\$2,951,599.83	\$1,569,584.20	\$4,521,184	\$2,938,769.62	2.6%
TOTALS		\$1,040,096,758.22	1,247,618.02	\$28,271,024.34	\$15,033,797.14	\$43,304,819	\$28,574,859.13	2.7%

*Source: SEMCOG & US Census Bureau

**Source: US Census Bureau

***Water usage measured at the Highland Park Treatment Facility Dec 2011 to Nov 2012 equaled 2.25 MGD. (Average usage of 9.79 KCF per person year)

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Return to Excellence

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RE: CHART OF GLWA/DWSD OVERCHARGES 2006-2016

YEAR	DWSD/GLWA BILLED REVENUE*	CONSENT DECREE AGREED PAYMENT OF 65% FOR SEWER SERVICES AFTER AUG. 1, 1996	PAYMENTS MADE BY THE CITY OF HIGHLAND PARK	AMOUNT OF OVERCHARGE
2016	\$5,617,200.00	\$2,223,569.61	\$2,560,807.84	\$3,393,630.39
2015	\$5,569,200.00	\$2,709,489.85	\$2,560,807.84	\$2,859,710.15
2014	\$6,887,428.00	\$2,344,610.26	\$2,560,807.84	\$4,542,817.74
2013	\$5,007,724.00	\$2,409,327.24	\$2,560,807.84	\$2,598,396.76
2012	\$4,840,249.00	\$2,476,915.63	\$2,560,807.84	\$2,363,333.37
2011	\$4,497,397.00	\$2,546,933.67	\$2,560,807.84	\$1,950,463.33
2010	\$3,965,206.00	\$2,601,048.55	\$2,560,807.84	\$1,364,157.45
2009	\$4,438,562.00	\$2,695,583.95	\$2,560,807.84	\$1,742,978.05
2008	\$4,363,745.00	\$2,773,774.43	\$2,560,807.84	\$1,589,970.57
2007	\$3,666,450.00	\$2,854,836.32	\$2,560,807.84	\$811,613.68
2006	\$3,370,616.00	\$2,938,769.62	\$2,560,807.84	\$431,846.38
TOTALS	\$52,223,777.00	\$28,574,859.13	\$28,168,886.24	\$23,648,917.87

*Source: EMMA publicly disclosed financial information

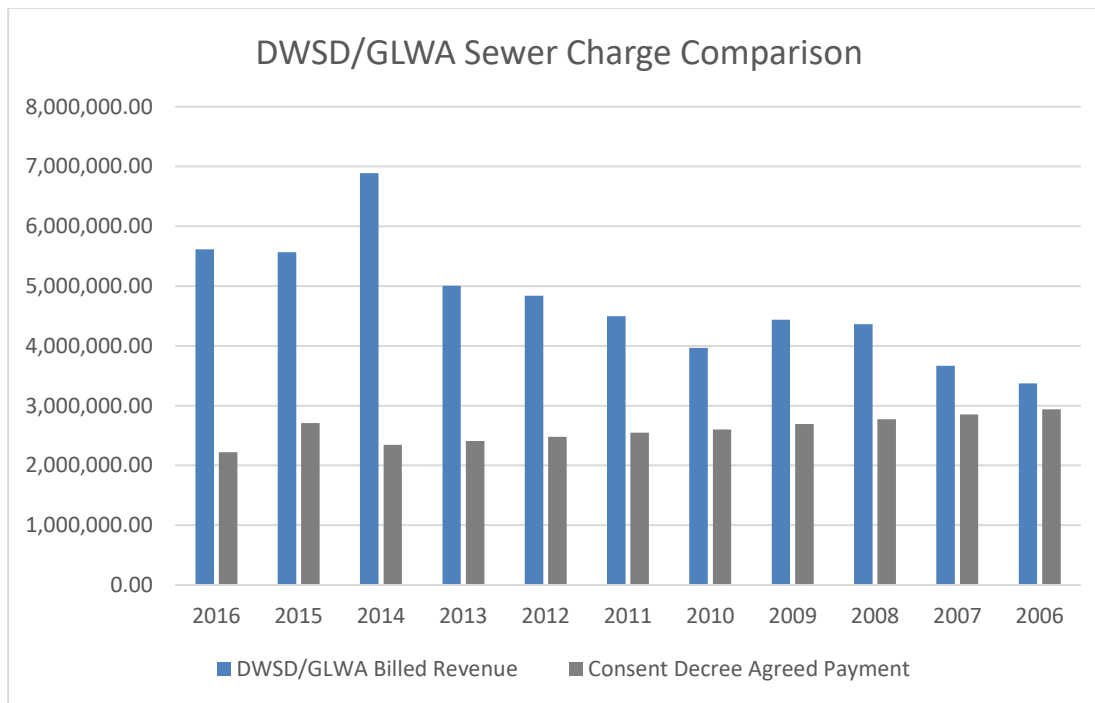
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